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BY ECF

The Honorable Denise Cote
United States District Court, Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: Novartis Vaccines and Diagnostics, Inc. et al. ("Novartis") v. Regeneron Pharmaceuticals, Inc. ("Regeneron"), No. 18-cv-2434 (DLC) (S.D.N.Y.)

Dear Judge Cote:

Pursuant to the Court's instruction at the April 24, 2019, conference and the Court's order, Dkt. 226, the parties submit this joint timeline of the parties' communications on April 8 with Dr. Wurm and with each other regarding Dr. Wurm. In accordance with the Court's instructions, Plaintiffs consent to this submission.

Date	Time (EDT)	Who	Description
8-Apr-2019	9:57 AM	Regeneron	Email from Andrew Cohen to Dr. Wurm, asking whether Dr. Wurm is interested in discussing a new project
8-Apr-2019	10:07 AM	Regeneron	Dr. Wurm confirms interest, asks for a phone call
8-Apr-2019	10:14 AM	Regeneron	Cohen responds to Dr. Wurm, providing cell phone number
8-Apr-2019	10:16 AM	Regeneron	Dr. Wurm confirms he will call Cohen later
8-Apr-2019	12:19 PM	Regeneron	Dr. Wurm conversation with Cohen (2 minutes - call was cut off) (Ex. A.)
8-Apr-2019	12:21 PM	Regeneron	Dr. Wurm conversation with Cohen (11 minutes) (Ex. A.)
8-Apr-2019	12:35 PM	Novartis	Email from Thomas Ehrich to Dr. Wurm, discussing drafting rebuttal reports as previously arranged in January 2019.

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Date	Time (EDT)	Who	Description
8-Apr-2019	1:16 PM	Novartis	Response from Dr. Wurm, stating he remains willing to draft rebuttal report.
8-Apr-2019	1:24 PM	Novartis	Ehrich arranges to send background materials.
8-Apr-2019	1:57 PM	Regeneron	Cohen emails protective order and written assurance to Dr. Wurm (Dkt. 221-1)
8-Apr-2019	4:01 PM	Regeneron	Dr. Wurm signs and returns written assurance portion of protective order (Dkts. 221-2, 221-4)
8-Apr-2019	9:38 PM	Parties	Regeneron sends Dr. Wurm's signed written assurance to Novartis (Dkt. 221-3, 211-4)
8-Apr-2019	10:16 PM	Parties	Novartis informs Regeneron that Dr. Wurm is already retained (Dkt. 221-5)
8-Apr-2019	10:49 PM	Novartis	Ehrich sends Dr. Wurm Regeneron email with Wurm CV and Written Assurance.
8-Apr-2019	10:52 PM	Parties	Novartis follows-up with Regeneron (Dkt. 221-5)
8-Apr-2019	11:07 PM	Parties	Regeneron confirms receipt of Novartis's emails, confirms will act accordingly (Dkt. 221-5)

Respectfully submitted,

/s/ Irena Royzman